UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

In Re:

NIGERIA CHARTER FLIGHTS CONTRACT

LITIGATION

MDL Docket No.: 2904-1613 (RJD) (MDG)

THIS DOCUMENT RELATES TO:

04-CV-0304 (RJD) (MDG)

Anyoku et al v. World Airways, Inc. et al.

04-CV-0473 (RJD) (MDG)

MBA v. World Airways, Inc. et al.

DECLARATION OF BRENDAN ZAHNER

BRENDAN ZAHNER hereby declares pursuant to 28 U.S.C. § 1746 as follows:

- 1. I am an attorney with SNR Denton US LLP, and prior to my current employment I was an associate at Thacher Proffitt & Wood LLP ("TPW") from 2001 to 2008. While employed at TPW I worked on the captioned litigation for the entire time TPW was involved in the case.
- 2. As a TPW attorney assigned to this litigation, I am familiar with TPW's billing practices both generally and with respect to this litigation. TPW required that contemporaneous time records be maintained, and that policy was followed with respect to this litigation.
- 3. I am familiar with the specific time records submitted by TPW in this litigation, and those time records are contemporaneous time records.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: September 23, 2011

Mersh Jahner Brenden Zahner